

REMARKS

Claims 1-22 were pending in the application. In response to the office action, applicants have amended the specification, cancelled non-elected claims 16-22 without prejudice or disclaimer, and amended claims 1, 2, 7, 10, 12, and 14-15.

Applicants wish to thank the Examiner for the thorough review of the application and for indicating allowable subject in claims 1-6, 13, and 15.

Claims 1-6 were rejected under 35 U.S.C. § 112, second paragraph because of an editorial oversight and a typographical error. Applicants have amended the specification and claims in accordance with the Examiner's suggestion to correct the typographical error and clarify that N and s are each positive integers. Applicants submit that claims 1-6 are now in proper form and are in condition for allowance.

Claim 12 is rejected under 35 U.S.C. § 102(e) as being anticipated by Jacobson et al. (U.S. Patent No. 6,445,489). Applicants have amended claim 12 to overcome this rejection. Specifically, applicants have clarified that the first and second pulses are electrical pulses. Jacobson, which is directed to electronic ink, describes the use of light pulses on light activated materials. Applicants submit that one skilled in the art would not consider the electronic ink techniques for manipulating light activated materials described in Jacobson as applicable to other electronic display applications. Accordingly, amended claim 12 is believed to be patentably distinguished over Jacobson.

Claim 14 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Jacobson in view of Hughes (U.S. Patent No. 5,905,482). Applicants respectfully traverse this rejection, as it might be applied to amended claim 14, for the following reasons.

In view of the amendment of independent claim 12 and claim 14, Jacobson does not read on the recited electrical pulses of different widths. Hughes fails to make up for the deficiencies in Jacobson, and accordingly the combination fails to establish a prima facie case of obviousness. Applicants further note that the two references are from different fields of art, with Jacobson describing an electronic ink application while Hughes relates to LCDs. Applicants submit that one skilled in the art would not be motivated to modify the teachings of Jacobson with the techniques described in Hughes.

Accordingly, applicants submit that claim 14 is patentable over Jacobson in view of Hughes.

Claims 7-10 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Jacobson in view of Hughes. Claim 11 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Jacobson, in view of Hughes, and further in view of Green (U.S. Patent No. 5,124,695). Applicants respectfully traverse these rejections, as they might be applied to amended claims 7-11, for the following reasons.

Claim 7 has been amended to clarify that the driver applies a pulse-width modulated electrical waveform, thereby obviating the non-analogous Jacobson reference, which describes only light modulation techniques. Neither the Hughes nor the Green reference makes up for the deficiencies in Jacobson, and thus the combination of references fails to establish a prima facie case of obviousness.

Moreover, applicants submit that one skilled in the art would not consider the electronic ink techniques for manipulating light activated materials described in Jacobson as applicable to other electronic display applications, such as those described in Hughes or Green. Applicants further note that the concept of subpixels appears to be substantially different in Jacobson, as compared to either Hughes or Green. Jacobson is essentially directed to a layered photoconductive material which can be increasingly darkened by varying the exposure technique. It is not readily apparent that the techniques described in Hughes or Green would have any applicability to Jacobson or that any combination of the references would produce an operative result. Accordingly, applicants submit that there is no motivation to modify the Jacobson reference with the teachings of either Hughes or Green.

Because none of the cited references teaches or suggests a driver to apply a pulse-width modulated electrical waveform to the first subpixel and the second subpixel, the modulated waveform having a first pulse and a second pulse, the first pulse being applied to the first subpixel and the second pulse being applied to the first subpixel and the second subpixel, and further because there is no motivation to modify the electronic ink light modulation techniques described in Jacobson with the LCD techniques described in the secondary references, claim 7 and its dependent claims 8-11 are patentable over the cited combination of references.

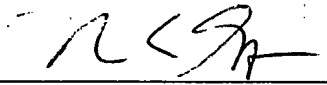
In view of the foregoing, favorable reconsideration and withdrawal of the rejections is respectfully requested. Early notification of the same is earnestly solicited. If there are any questions regarding the present application, the Examiner is invited to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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